

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ) CRIMINAL NO. 04-10128-MLW  
                            )  
                            v. )  
                            )  
XINGYU JIANG ) VIOLATION:  
                          ) Ct. 1: 18 U.S.C. §1542  
                          a/k/a Hiroshi Hattori ) False Statement in Passport Application  
                          Defendant ) Ct. 2: 42 U.S.C. §408(a)(7)(B)-Misuse  
  ) of Social Security Number  
  ) Ct. 3: 18 U.S.C. §1028(a)(4)-Possession  
  ) of Unlawful Identification Document to  
  ) Defraud the United States

INDICTMENT

COUNT ONE: (18 U.S.C. §1542)(False Statement in Passport Application)

The Grand Jury charges:

On or about February 16, 2001, in the District of Massachusetts

XINGYU JIANG a/k/a  
Hiroshi Hattori

the defendant herein, did willfully and knowingly make a false statement on an application for a United States passport with the intent to induce and secure the issuance of a passport under the authority of the United States, either for his own use or the use by another.

All in violation of Title 18, United States Code, Section 1542.

**COUNT TWO:** 42 U.S.C. §408(a)(7)(B)–Misuse of Social Security Number

The Grand Jury further charges:

On or about February 16, 2001, in the District of Massachusetts,

**XINGYU JIANG a/k/a  
Hiroshi Hattori**

the defendant herein, with intent to deceive, falsely represented a number to be the social security account number assigned by the Commissioner of Social Security to him, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

**COUNT THREE:** 18 U.S.C. §1028(a)(4)–Possession of Unlawful Identification Document to Defraud the United States

The Grand Jury further charges:

On or about February 16, 2001, in the District of Massachusetts,

**XINGYU JIANG a/k/a  
Hiroshi Hattori**

the defendant herein, did possess an identification document other than one issued lawfully for the use of the possessor, that is a Massachusetts driver's license in the name of Hiroshi Hattori, with the intent that such document be used to defraud the United States.

All in violation of Title 18, United States Code, Section 1028(a)(4).

A TRUE BILL

Susan Buechle  
FOREPERSON OF THE GRAND JURY

Sandra S. Bower  
SANDRA S. BOWER  
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS Q 12:02pm 21 April, 2004

Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK